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January 24, 2014

**VIA E-MAIL [olinger.keith@epa.gov] AND
CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Mr. Keith Olinger
U.S. Environmental Protection Agency
Superfund Division
75 Hawthorne Street, SFD-7-5
San Francisco, California 94105

Re: **Real Property Located at 10643 Norwalk Boulevard, Santa Fe Springs, CA
Omega Chemical Corporation Superfund Site ("Omega Site")**

Dear Mr. Olinger:

By way of introduction, this response is provided on behalf of Continental Development Company, L.P. ("CDC") in connection with the U.S. EPA's December 18, 2013 letter ("EPA Letter") regarding the subject property and matter. The EPA Letter contains a number of assertions and certain of such assertions are addressed in this letter.

First, EPA asserts that CDC acquired the real property at 10643 Norwalk Boulevard, Santa Fe Springs, California ("Property") after January 11, 2002 and that CDC is the current owner of the Property. Although it is correct that CDC acquired the Property after January 11, 2002, CDC is not the current owner of the Property. The current owner of the Property is Continental Heat Treating, Inc. ("CHT").

Since CDC is not the current owner of the Property, CDC is not potentially liable under Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), as amended, 42 U.S.C. §9607(a). (Further, there was no disposal of hazardous substances at the Property during CDC's ownership of the Property. Specifically, there was no disposal of any volatile organic compounds ("VOCs"), such as perchloroethylene ("PCE") or trichloroethylene ("TCE") at the Property during CDC's period of ownership. No such VOCs were used or otherwise handled on the Property during CDC's period of ownership.)

Further, at the time CDC acquired the Property, it met the criteria to qualify as a bona fide prospective purchaser ("BFPP"). First, CDC performed "all appropriate inquiry" into the previous ownership and uses of the Property before it acquired the Property.

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Second, during CDC's ownership period, it exercised appropriate care and took reasonable steps with respect to the alleged former hazardous substance release at the Property. That is, the use of VOCs was terminated before CDC acquired the Property thereby eliminating the potential for any continuing or future releases. Further, the Property was subject to investigation and monitoring under the direction and approval of the State of California Regional Water Quality Control Board which prevented or limited human, environmental, or natural resource exposure to the alleged earlier hazardous substance release.

Accordingly, CDC is not a potentially responsible party under CERCLA in connection with the Omega Site.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael A. Francis", with a long horizontal flourish extending to the right.

Michael A. Francis

MAF/blt